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May 28, 2024

Magistrate Peggy Kuo, U.S.M.J.  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

**Re: State Farm Mut. Auto. Ins. Co., et al. v. Metro Pain Specialists P.C., et al.**  
**Case No.: 1:21-cv-05523-MKB-PK**

Dear Magistrate Kuo:

As Your Honor may recall, this firm represents defendants Yan Moshe, Hackensack Specialty ASC LLC, Integrated Specialty ASC LLC, Reuven Alon, Columbus Imaging Center LLC, Medaid Radiology LLC, SCOB LLC, Citimed Surgery Center LLC, NJMHC LLC, Star Solutions Services, LLC, Beshert Corp., Nizar Kifaieh, M.D., and Premier Anesthesia Associates PA (collectively "Defendants") in the above referenced matter. I am writing to advise Your Honor of the status of Defendants' ESI production responsive to the discovery demands of plaintiffs State Farm Mutual Automobile Insurance Company and State Farm Fire and Casualty Company (collectively, "Plaintiffs"), and to confirm the production is ongoing.

On February 22, 2024, Your Honor held a conference regarding various discovery issues, including Defendants' ESI records responsive to Plaintiff's discovery demands. During the conference, I advised Your Honor that Defendants were in the process of retaining a third-party vendor to complete the collection and production of ESI. Since that time, the collection and production process has been moving forward. Given the magnitude of the data, the process has been tedious. On April 5, 2024, Your Honor extended the production deadline to May 23, 2024. At this time, the Defendants have begun a rolling production of the documents. I have discussed the status of the production with counsel for Plaintiffs, and advised Defendants estimate an additional two (2) to three (3) weeks would be needed to complete the rolling production. I also advised Plaintiffs' counsel that Defendants would extend the same courtesy if necessary for Plaintiffs' ESI production, which has not yet begun.

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Based on the foregoing, *Defendants anticipate completion of the production on or before June 14, 2024 and respectfully request that Your Honor “so order” same.* Plaintiffs’ counsel advised Plaintiffs take no position on the request.

Thank you for Your Honor’s consideration.

Respectfully submitted,

/s/ *Anthony M. Juliano*

Anthony M. Juliano

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